

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SHAMIRA CONAWAY, Individually and on Behalf of All Others Similarly Situated,	§ CIVIL ACTION NO. 6:15-cv-00186-WSS
Plaintiff,	§
VS.	§
WCS SERVICES, LLC, WARDLAW CLAIMS SERVICE, LLC, WCCA, INC., WARDLAW INSURANCE SERVICES, LLC, WARDLAW CLAIMS TRAINING CENTER, LLC, WARDLAW AUTO CLAIMS SOLUTIONS, LLC, WARDLAW CONSULTING SERVICES, INC., CUSTOM DATA SYSTEMS, INC., WILLIAM F. WARDLAW, MICHAEL WARDLAW, REBECCA MEADOWS, and STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY,	§ COLLECTIVE ACTION
Defendants.	§ JURY TRIAL DEMANDED

JOINT MOTION TO DISMISS WITH PREJUDICE

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

Plaintiffs Shamira Conaway, Shamecca Adams, Shienita Woods, Kenneth Gault, Elizabeth Speed, Veronica Thomas, Theresa Walker, Inetta Starks, Danette McCrary, Charleszetta Mingo, Jackie Mitchell, Terry Sims, Marjorie Castro, Marlo Solomon, John Bowman, Tyrone Haynes, and Leticia Gant ("Plaintiffs"), and Defendants WCS Services, LLC, Wardlaw Claims Service, LLC, WCCA, Inc., Wardlaw Insurance

Services, LLC, Wardlaw Claims Training Center, LLC, Wardlaw Auto Claims Solutions, LLC, Wardlaw Consulting Services, Inc., Custom Data Systems, Inc., William F. Wardlaw, Michael Wardlaw, and Rebecca Meadows (“Wardlaw Defendants”) and State Farm Mutual Automobile Insurance Company (“State Farm,” collectively with Wardlaw Defendants, “Defendants”) file this *Joint Motion to Dismiss with Prejudice* and would respectfully show the following:

DISMISSAL WITH PREJUDICE

Plaintiffs request that this case be dismissed in its entirety as against all Defendants with prejudice to refilling the same and that all costs and attorneys’ fees be paid by the party incurring the same. Defendants join in this motion to dismiss with prejudice.

PRAYER

WHEREFORE, Plaintiffs and Defendants pray that this motion be granted and that this case be dismissed in its entirety with prejudice to refiling the same and that all costs and attorneys’ fees shall be paid by the party incurring the same.

Respectfully submitted,

/s/ *Michael A. Starzyk* _____
Michael A. Starzyk
Texas Bar No. 00788461
mstarzyk@starzyklaw.com
April L. Walter
TX Bar No. 24052793
awalter@starzyklaw.com
Megan M. Mitchell
TX Bar No. 24073504
mmitchell@starzyklaw.com
Starzyk & Associates, PC
10200 Grogan’s Mill Rd, Suite 300
The Woodlands, Texas 77380
Telephone: (281) 364-7261

Facsimile: (281) 364-7533

ATTORNEYS FOR PLAINTIFFS

*/s/ David M. Mathews** _____

David M. Mathews

dmathews@slmpc.com

Philip E. McCleery

pmccleery@slmpc.com

Sheehy, Lovelace & Mayfield, PC

510 N. Valley Mills Drive, Suite 500

Waco, TX 76710

254.772.8022 Telephone

254.772.9297 Facsimile

ATTORNEYS FOR WARDLAW

DEFENDANTS

-AND-

*/s/ Geoffrey DeBoskey** _____

Geoffrey DeBoskey

gdeboskey@sidley.com

Douglas R. Hart

dhart@sidley.com

Sidley Austin LLP

555 West Fifth Street

Los Angeles, CA 90013

213-896-6000 Telephone

213.896.6600 Facsimile

Yvette Ostolaza

Yvette.ostolaza@sidley.com

Angela C. Zambrano

Angela.zambrano@sidley.com

Casey A. Burton

Casey.burton@sidley.com

Sidley Austin, LLP

2001 Ross Ave., Suite 3600

Dallas, Texas 75201

214.981.3300 Telephone

214.981.3400 Facsimile

ATTORNEYS FOR STATE FARM

**Signed by Permission*

CERTIFICATE OF CONFERENCE

Plaintiffs' counsel and Defendants' counsel have conferred and the parties are in agreement to the requested relief herein.

/s/ Michael A. Starzyk
Michael A. Starzyk

SO ORDERED:

SIGNED this ____ day of January, 2016.

WALTER S. SMITH JR.
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of January, 2016, I served the foregoing on the following in accordance with the Federal Rules of Civil Procedure:

David M. Mathews

dmathews@slmpc.com

Philip E. McCleery

pmccleery@slmpc.com

Sheehy, Lovelace & Mayfield, PC
510 N. Valley Mills Drive, Suite 500
Waco, TX 76710
254.772.8022 Telephone
254.772.9297 Facsimile

ATTORNEYS FOR WARDLAW DEFENDANTS

-AND-

Geoffrey DeBoskey

gdeboskey@sidley.com

Douglas R. Hart

dhart@sidley.com

Sidley Austin LLP
555 West Fifth Street
Los Angeles, CA 90013
213-896-6000 Telephone
213.896.6600 Facsimile

Yvette Ostolaza

Yvette.ostolaza@sidley.com

Angela C. Zambrano

Angela.zambrano@sidley.com

Casey A. Burton

Casey.burton@sidley.com

Sidley Austin, LLP
2001 Ross Ave., Suite 3600
Dallas, Texas 75201
214.981.3300 Telephone
214.981.3400 Facsimile

ATTORNEYS FOR STATE FARM

/s/ Michael A. Starzyk/
Michael A. Starzyk